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U.S. Department of Justice
United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

March 7, 2013

BY ELECTRONIC MAIL

Honorable J. Paul Oetken
United States District Judge
United States Courthouse
40 Centre Street
New York, New York 10007

MEMO ENDORSED

Re: United States v. Mikhail Zemlyansky et al.
S1 12 Cr. 171 (JPO)

Dear Judge Oetken:

The Government respectfully writes to request a brief extension of time by which to file its opposition to the defendants' motions – from March 8, 2013, to March 13, 2013 – to allow for the Government and several defendants to continue plea discussions in the hopes of reaching a disposition prior to the Government's filing of its opposition. All defense counsel have been notified of this request, and every defense counsel who filed a motion consents to the proposed adjournment.

In turn, the parties propose that the defendants' deadline to file their reply briefs also be extended five days, from March 27, 2013, to April 1, 2013. The Court had previously scheduled oral argument on the motions for April 5, 2013, which the parties recognize would not likely provide the Court with enough time to review the motions prior to hearing argument.

Extensions granted: Government's opposition is due March 13, 2013. Defendants' reply briefs are due April 1, 2013.

Oral argument will proceed as scheduled on April 5, 2013 at 10 a.m.

SO ORDERED:

J. PAUL OETKEN 3/7/13
U.S.D.J.

Hon. J. Paul Oetken
March 7, 2013
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To that end, the Government and the parties will coordinate with the Court's chambers before suggesting a possible alternative for the oral argument for some time after April 5, 2013, which the Government will include in its filing on March 13, 2013.

Respectfully submitted,

PREET BHARARA
United States Attorney

By: _____ /s/

Daniel S. Goldman
Nicholas L. McQuaid
Carolina A. Fornos
Assistant United States Attorneys
(212) 637-2200

cc: All Defense Counsel (By Email)